

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,]	
]	
Plaintiff,]	
v.]	No. 08 CR 947-12
]	
RIGOBERTO MOLINA,]	Hon. Amy St. Eve
]	
Defendant.]	

DEFENDANT MOLINA'S PROPOSED VOIR DIRE

NOW COMES, the defendant, RIGOBERTO MOLINA ("MOLINA"), by and through his attorney, MICHAEL J. PETRO, and hereby submits the following proposed voir dire pursuant to F.R.C.P. 24. **This document was prepared in conjunction with co-defendant Fabian Matinez's proposed voir dire filed at docket 128. Defendant MOLINA hereby adopts and incorporates that filing into this document.** Defendant MOLINA further requests that this Honorable Court to inquire as follows:

1. Have you or any member of your family had any experience in dealing with problems, legal, medical, or otherwise, that related to the use or abuse of controlled substances or alcohol?
2. Are you a member of any organization which is dedicated to drug abuse education or awareness, such as "Just Say No" or "Dare"?
3. Are you or a member of your family involved in any community policing organizations? If yes, do you have direct contact with the police?
4. Do you have any special knowledge or experience regarding the enforcement of drug laws in the United States or the State of Illinois?

5. Do you have any prejudices or biases related to illegal drugs of which the Court should be aware?
6. Do you have any prejudice or bias against Spanish speaking people?
7. Have you had negative experiences with Spanish speaking people in the past that would cause you to be prejudiced or biased?
8. Do you have strong feelings about immigration? If yes, what are those feelings?
9. Are you mad or angry because we have an African American as President of the United States?
10. Do you speak any languages other than English?
11. Have you had any education or training in speaking any language other than English?
12. Do you have any bias or prejudice against lawyers that defend the accused?
13. Do you think that law enforcement officers should tell the whole truth and nothing but the truth?
14. Do you watch news on the television? If so, do you have a preferred television news source or commentator?
15. Do you think that people that testify can have motives or biases that can affect their testimony?
16. Can you eliminate outside influences in your life and judge this case based on the evidence presented in court?
17. Are you a member of any fraternity, sorority or social organization that has an ideological plan or political agenda?
18. Would you automatically believe the opinion of an expert witness?

19. Would you automatically believe the testimony of a scientist?
20. If an expert witness or scientist were to testify to results produced by a machine,
would you automatically believe the machine's results?
21. Do you have any independent knowledge or training of police procedures or
investigative techniques? If yes, what are they?
22. Do you have any independent knowledge or training regarding the use of DNA?

Respectfully submitted,

s/Michael J. Petro
Michael J. Petro

Petro & Associates
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CERTIFICATE OF SERVICE

I, Michael J. Petro, an attorney, state that I caused to be filed, by electronic filing (ECF), with the Clerk of the United States District Court for the Northern District of Illinois, the foregoing:

DEFENDANT MOLINA'S PROPOSED VOIR DIRE

The undersigned also certifies, as to the following parties, that in accordance with F.R.Civ.P. 5, LR 5.5 and the General Order on Electronic Case Filing (ECF), the foregoing pleading, along with a notice of motion if required, were served pursuant to the district court's ECF system on August 23, 2010.

By His Attorney,

/s Michael J. Petro
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